

EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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DONALD J. TRUMP FOR)
PRESIDENT, INC., et al.,)
Plaintiffs,)
vs.) No.
KATHY BOOCKVAR, et al.,) 2:20-cv-966-RN
Defendants.)

Tuesday, September 29, 2020

The videotape video conference deposition of
15 LAUREEN HAGAN, called as a witness by the plaintiffs,
pursuant to notice and the Federal Rules of Civil
16 Procedure pertaining to the taking of depositions,
taken before me, the undersigned, Lance E. Hannaford,
17 Notary Public in and for the Commonwealth of
Pennsylvania, at 2568 Aldon Drive, Sewickley,
18 Pennsylvania 15143, commencing at 2:10 o'clock p.m.,
the day and date above set forth.

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Transcript of Laureen Hagan 30 (b) (6)

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1 It is this year that they have had some
2 that have merged for other reasons. Others are doing
3 so, or changing locations based off of COVID. So the
4 last number I had heard, which was probably several
5 weeks ago, is about 270 something unique locations.

6 Q So does that mean that there might be
7 locations that have two or more precinct, in-person
8 precinct voting in the same location? Two precincts
9 voting in the same location?

10 A Yes. That is correct.

11 Q Other than the 270 locations that you
12 mentioned, will there be any satellite offices of the
13 election office where people can return mail-in or
14 absentee ballots?

15 A Yes. The county is expecting to have three
16 voter service centers. That would be to the Media
17 bureau of election office inside the Government
18 Center. As well as a location in Upper Darby in the
19 voter services building. And also, in Chester City
20 Hall.

21 Q Will those voter service centers be manned?

22 A Yes. They will be.

23 Q Will they have particular hours of
24 operation, or days they are open, or times that voters
25 can return their ballots?

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1 Those type of items.

2 We could also send a letter out, not
3 necessarily a rejection letter. But a notice to the
4 voter that their identification review did not pass.
5 So we give them that notice and explain to them their
6 requirement to satisfy that need.

7 Q So in addition to the in-person voting, and
8 that is at the voting locations, the polling
9 locations, and the three voter service center
10 locations, are there any other methods or means that
11 Delaware County intends to use to allow voters to
12 return their mail-in ballots?

13 A At this time they are -- the county is
14 considering a mobile site where they would perhaps one
15 day travel to one location, the next day to another
16 location. That is not fully established at this
17 moment. But that is they are hoping to deploy later
18 in the election cycle.

19 Q So can you explain what the mobile site
20 would look like? Would it be a vehicle? Or would it
21 be like a temporary site that is set up under a tent,
22 and then it moves from place to place? Could you
23 explain that a little more?

24 A A little more the method described in the
25 second item. So it is going to a different area one

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1 day it might be going to a certain library another
2 day. It might be going to a senior citizens center or
3 such as that.

4 So it will travel. It will be listed as
5 far as where they are going to go. But it is not
6 being done in a vehicle, no. It will be in a
7 building. And that building could change from day to
8 day.

9 Q And who would be manning that mobile site?

10 A The concept is not fully finalized at this
11 time. It would be an employee of the Delaware County
12 board of elections.

13 Q When does the county expect it will have a
14 final plan in place with respect to the mobile site or
15 employment of the mobile site?

16 A Last time I heard it discussed, that would
17 not come under the direct purview of my office. The
18 last time I heard it discussed, it would be within the
19 next week to ten days.

20 Q Would the mobile site be similar to one of
21 these voter service centers, just in a different
22 location from day to day?

23 A Yes. I think that is an appropriate
24 summary.

25 Q Other than the potential use of a mobile

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1 site and the voter service centers, any other method
2 that the county intends to use for voters to return
3 their mail-in ballots?

4 A Can you repeat the question?

5 Q Sure.

6 Other than the mobile site, the potential
7 use of the mobile site, and the three voter service
8 center locations, that you mentioned, are there any
9 other means or methods that Delaware County intends to
10 employ for voters to return their mail-in ballots?

11 A Yes. The county intends to deploy these
12 drop boxes throughout the county.

13 Q Could you explain what you mean by drop
14 box?

15 A Certainly.

16 If a voter receives a by mail product, if
17 they requested mail-in or absentee, we would send that
18 to the address where they asked it go to.

19 Then the county's expectation is we are
20 trying to secure 50 locations to have drop boxes. 50
21 being that we have 49 municipalities in our county
22 plus one at the government/courthouse complex in
23 Media, the county seat. So that is where the 50 count
24 comes from. And that a voter could deposit their
25 ballot into a drop box in one of the locations.